

COOLEY LLP  
HEIDI L. KEEFE (178960)  
(hkeefe@cooley.com)  
REUBEN H. CHEN (228725)  
(rchen@cooley.com)  
DANIEL J. KNAUSS (267414)  
(dknauss@cooley.com)  
LAM K. NGUYEN (265285)  
(lnguyen@cooley.com)  
ALEXANDRA LEEPER (307310)  
aleeper@cooley.com  
DEEPA KANNAPPAN (313573)  
(dkannappan@cooley.com)  
3175 Hanover Street  
Palo Alto, CA 94304-1130  
Telephone: (650) 843-5000  
Facsimile: (650) 849-7400

DUSTIN M. KNIGHT (*pro hac vice*)  
(dknight@cooley.com)  
11951 Freedom Drive, 16th Floor  
Reston, VA 20190  
Telephone: (703) 456-8000  
Facsimile: (703) 456-8100

GREENBERG TRAURIG, LLP  
KYLE D. CHEN (239501)  
kchen@gtlaw.com  
1900 University, Avenue, 5th Floor  
East Palo Alto, CA 94304  
Telephone: (650) 289-7887  
Facsimile: (650) 328-8508

Attorneys for Defendant and Counter-claimant  
COOLIT SYSTEMS, INC. and Defendants  
CORSAIR GAMING, INC. and CORSAIR  
MEMORY, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ASETEK DANMARK A/S,  
  
Plaintiff and  
Counter-defendant,

v.

COOLIT SYSTEMS, INC.,  
  
Defendant and  
Counter-claimant,  
  
CORSAIR GAMING, INC. and CORSAIR  
MEMORY, INC.,  
  
Defendants.

Case No. 3:19-cv-00410-EMC

**DECLARATION OF REUBEN CHEN IN  
SUPPORT OF DEFENDANTS'  
ADMINISTRATIVE MOTION TO FILE UNDER  
SEAL**

1  
2 I, Reuben Chen, do hereby declare as follows:

3 1. I am an attorney licensed to practice before this Court and all courts of the State of  
4 California, and am a partner with Cooley LLP, counsel for Defendant and Counter-Plaintiff CoolIT  
5 Systems, Inc. ("CoolIT") and Defendants Corsair Gaming, Inc. and Corsair Memory, Inc.  
6 (collectively, "Corsair") in the above-entitled action. I submit this declaration in support of  
7 Defendants' Administrative Motion to File Under Seal. The matters stated herein are based upon  
8 my personal knowledge, and if called as a witness, I would testify as to the following statements.

9 2. The factual representations made in the motion to seal filed concurrently with this  
10 declaration are true.

11 3. Through my work on behalf of CoolIT and Corsair, I have become familiar with  
12 CoolIT's and Corsair's practices regarding the treatment of sensitive business and technical  
13 information. Unless otherwise stated, the facts I set forth in this declaration are based on my  
14 personal knowledge or knowledge I obtained through my review of corporate records or other  
15 investigation. If called upon as a witness, I could testify to them competently under oath.

16 4. CoolIT seeks to seal Exhibits 1, 3, and 7 the Declaration of Reuben Chen in support  
17 of Defendants' Motion for Summary Judgment. These documents contains highly sensitive and  
18 confidential proprietary, technical information relating to CoolIT's products.

19 5. I believe the information requested to be sealed is narrowly tailored. CoolIT seeks  
20 to seal only three exhibits to the Chen Declaration. CoolIT considers this confidential information  
21 to be highly sensitive, and CoolIT does not publicly disclose such information, which would cause  
22 competitive harm to CoolIT.

23 6. I declare under penalty of perjury under the laws of the United States that the  
24 foregoing is true and correct to the best of my knowledge.  
25  
26  
27  
28

1 EXECUTED at Sunnyvale, California on this 31st day of March 2022.

2  
3  
4 /s/ Reuben Chen  
Reuben Chen  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28